

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE  
No. 1:19-cv-01219-UNA

ALICIA A. COHEN,  
Plaintiff,

v.

RONALD A. COHEN,  
Defendant.

**DEFENDANT'S ANSWER TO FIRST AMENDED VERIFIED COMPLAINT FOR  
CHILD SEXUAL ABUSE AND HUMAN TRAFFICKING**

NOW COMES Defendant, Ronald A. Cohen, and responds to the First Amended Complaint. All allegations not herein specifically admitted are denied. Otherwise, Defendant responds to the allegations of the First Amended Complaint as follows:

**INTRODUCTION**

1. The allegations contained in this paragraph including legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied. Defendant specifically denies the actions as described in this paragraph.

**THE PARTIES, JURISDICTION, AND VENUE**

2. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore, the allegations are denied.

3. It is admitted that Defendant is a resident of Leland, North Carolina. It is also admitted the Defendant previously resided in Delaware. It is also admitted that the Defendant has gone by the names Rafi and Ron. Except as admitted herein, the remaining allegations contained in this paragraph are denied.

4. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

5. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

6. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

7. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

### **BACKGROUND ON THE DISPUTE**

#### **Early Sexual Abuse And Commercial Sexual Exploitation**

8. It is admitted that the Defendant and his family lived in Newark, Delaware. Except as admitted herein, the remaining allegations contained in this paragraph are denied.

9. It is admitted that in or about 1985, the Defendant and his family lived in Oklahoma. It is also admitted that at some point in time, the Defendant and the Defendant's ex-wife Louise took a one-week trip to Canada and the Plaintiff and her brother remained in Oklahoma with friends. Except as admitted herein, the remaining allegations contained in this paragraph are denied.

10. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore, the allegations are denied. Defendant specifically denies "facilitating" the actions as described in this paragraph.

11. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore, the allegations are denied.

12. Denied. Defendant specifically denies the allegations related to a "paddle" described in this paragraph.

13. Denied.

14. Defendant is without sufficient knowledge to admit or deny the allegations contained herein and therefore, the allegations are denied.

**Child Sexual Abuse And Trafficking In Delaware At The Family Home, At "Prayer Meetings," And At "Board Meetings; The Making And Sale Of Tapes**

15. It is admitted that in or about September, 1985, the Defendant and his family returned to Delaware, residing at 44 Vansant Road, Newark, Delaware. Except as admitted herein, the remaining allegations contained in this paragraph are denied.

16. Denied.

17. Denied.

18. It is admitted that the Defendant hosted prayer meetings in the family home. Except as admitted herein, the remaining allegations contained in this paragraph are denied.

19. Denied.

20. Denied

21. Denied.

22. Denied.

23. Denied.

**Further Trafficking Across State Lines**

24. Denied.

25. It is admitted that Defendant and his family did take a trip to Disney World in Orlando, Florida. It also admitted that while in Orlando, the Defendant and his family visited with Defendant's cousin Lawrence. Except as admitted herein, the remaining allegations contained in this paragraph are denied.

26. Denied.

27. Denied.

28. It is admitted that a couple lived in New Jersey and the Defendant and his family visited the home of the couple. It is admitted that the couple has two children approximately Plaintiff's age. It is also admitted that the Defendant and his family were close family friends with the couple. Except as admitted herein, the remaining allegations contained in this paragraph are denied.

29. Denied.

30. Denied.

31. Denied.

**Additional Threats To Plaintiff And Efforts To Hide The Abuse**

32. Denied.

33. Denied.

34. Denied.

35. It is admitted that at some point in time, Plaintiff's mother Louise took Plaintiff to a therapist. Except as admitted herein, the remaining allegations contained in this paragraph are denied.

36. It is admitted that Plaintiff and her brother were home schooled by their mother Louise. Except as admitted herein, the remaining allegations contained in this paragraph are denied.

37. Denied.

38. Denied.

39. Denied.

**Laundering The Money And Using Ministry As Cover**

40. It is admitted that the Defendant has been an ordained minister since August, 1985. It is admitted that the Defendant is often referred to as “Reverend.” It is also admitted that the Defendant has created, operated or been affiliated with numerous ministries (including some websites) including Miracle Tabernacle Ministries, Messianic Tabernacle Ministries International, Travelling Ministers Fellowship, TMF Ministries, The Aaliyah Project and Wilmington Aaliyah. Except as admitted herein, the remaining allegations contained in this paragraph are denied.

41. Denied.

42. It is admitted that Defendant and his family worshipped at the House of Praise. Except as admitted herein, the remaining allegations contained in this paragraph are denied.

43. It is admitted that Defendant’s ministries are supported through donations. It is expressly denied that those donations were for sex acts. Except as admitted herein, the remaining allegations contained in this paragraph are denied.

**End of Direct Sexual Abuse, But Trafficking And Trauma Continue**

44. Denied.

45. It is admitted that Plaintiff saw a psychiatrist or therapist at some point in time. Defendant is without sufficient knowledge to admit or deny the remaining allegations contained herein, and therefore, the allegations are denied. Defendant specifically denies he has caused Plaintiff’s extreme mental, physical, psychological, and emotional trauma.

46. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore, the allegations are denied. Defendant specifically denies he has caused Plaintiff’s extreme mental, physical, psychological, and emotional trauma.

47. Denied.

48. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore, the allegations are denied. Defendant specifically denies he has caused Plaintiff's extreme mental, physical, psychological, and emotional trauma.

**Repression And Recovery Of Memories**

49. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore, the allegations are denied. Defendant specifically denies he has caused Plaintiff's extreme mental, physical, psychological, and emotional trauma.

50. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

51. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore, the allegations are denied. Defendant specifically denies he has caused Plaintiff's extreme mental, physical, psychological, and emotional trauma.

52. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore, the allegations are denied. Defendant specifically denies he has caused Plaintiff's extreme mental, physical, psychological, and emotional trauma.

53. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore, the allegations are denied. Defendant specifically denies he has caused Plaintiff's extreme mental, physical, psychological, and emotional trauma.

54. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

**Summary**

55. Denied.

56. Denied. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied. Defendant specifically denies he has caused Plaintiff's extreme mental, physical, psychological, and emotional trauma.

## **COUNT I**

### **HUMAN TRAFFICKING UNDER FEDERAL LAW – 18 U.S.C. § 2255**

#### **(Predicate Violations of 18 U.S.C. §§ 1589-91, 2241(c), 2242-43, 2251-52A 2260, 2421-23)**

57. The responses in the preceding paragraphs are incorporated by reference.
58. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.
59. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.
60. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.
61. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.
62. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.
63. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore, the allegations are denied.

**COUNT II**

**SEXUAL ABUSE OF A MINOR BY AN ADULT - DELAWARE**

**(Rape, Incest, Human Trafficking, Sexual Abuse of a Child By A Person in a Position of Trust, Sexual Extortion, Continuous Abuse of a Child, Dangerous Crime Against A Child Under 14, Offensive Touching, Indecent Exposure)**

64. The responses in the preceding paragraphs are incorporated by reference.
65. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.
66. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.
67. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.
68. Denied.
69. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.
70. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

**COUNT III**

**ASSAULT AND BATTERY - DELAWARE**

71. The responses in the preceding paragraphs are incorporated by reference.
72. The allegations contained in this paragraph including legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore,



the allegations are denied. Defendant specifically denies he has caused Plaintiff's extreme mental, physical, psychological, and emotional trauma. Defendant denies assaulting Plaintiff.

73. The allegations contained in this paragraph including legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore, the allegations are denied. Defendant specifically denies he has caused Plaintiff's extreme mental, physical, psychological, and emotional trauma. Defendant denies assaulting Plaintiff.

74. The allegations contained in this paragraph including legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore, the allegations are denied. Defendant specifically denies he has caused Plaintiff's extreme mental, physical, psychological, and emotional trauma. Defendant denies assaulting Plaintiff.

75. The allegations contained in this paragraph including legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore, the allegations are denied. Defendant specifically denies he has caused Plaintiff's extreme mental, physical, psychological, and emotional trauma. Defendant denies assaulting Plaintiff.

76. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

77. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

**COUNT IV**

**INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS - DELAWARE**

78. The responses in the preceding paragraphs are incorporated by reference.

79. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

80. The allegations contained in this paragraph including legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore, the allegations are denied. Defendant specifically denies he has caused Plaintiff's extreme mental, physical, psychological, and emotional trauma. Defendant denies assaulting Plaintiff.

81. The allegations contained in this paragraph including legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore, the allegations are denied. Defendant specifically denies he has caused Plaintiff's extreme mental, physical, psychological, and emotional trauma. Defendant denies assaulting Plaintiff.

82. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

83. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

**COUNT V**

**NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS - DELAWARE**

84. The responses in the preceding paragraphs are incorporated by reference.

85. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

86. The allegations contained in this paragraph including legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore, the allegations are denied. Defendant specifically denies he has caused Plaintiff's extreme mental, physical, psychological, and emotional trauma. Defendant denies assaulting Plaintiff.

87. The allegations contained in this paragraph including legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore, the allegations are denied. Defendant specifically denies he has caused Plaintiff's extreme mental, physical, psychological, and emotional trauma. Defendant denies assaulting Plaintiff.

88. The allegations contained in this paragraph including legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore, the allegations are denied. Defendant specifically denies he has caused Plaintiff's extreme mental, physical, psychological, and emotional trauma. Defendant denies assaulting Plaintiff.

89. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

90. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

**COUNT VI**

**FALSE IMPRISONMENT - DELAWARE**

91. The responses in the preceding paragraphs are incorporated by reference.

92. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

93. The allegations contained in this paragraph including legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore, the allegations are denied. Defendant specifically denies he has caused Plaintiff's extreme mental, physical, psychological, and emotional trauma. Defendant denies assaulting or restraining Plaintiff.

94. The allegations contained in this paragraph including legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore, the allegations are denied. Defendant specifically denies he has caused Plaintiff's extreme mental, physical, psychological, and emotional trauma. Defendant denies assaulting or restraining Plaintiff.

95. The allegations contained in this paragraph including legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore, the allegations are denied. Defendant specifically denies he has caused Plaintiff's extreme mental, physical, psychological, and emotional trauma. Defendant denies assaulting or restraining Plaintiff.

96. The allegations contained in this paragraph including legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore, the allegations are denied. Defendant specifically denies he has caused Plaintiff's extreme mental, physical, psychological, and emotional trauma. Defendant denies assaulting or restraining Plaintiff.

97. The allegations contained in this paragraph including legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore, the allegations are denied. Defendant specifically denies he has caused Plaintiff's extreme mental, physical, psychological, and emotional trauma. Defendant denies assaulting or restraining Plaintiff.

98. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

99. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

## **COUNT VII**

### **HUMAN TRAFFICKING - DELAWARE**

100. The responses in the preceding paragraphs are incorporated by reference.

101. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

102. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

103. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

104. Denied.

105. Denied.

106. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

107. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

108. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

109. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

#### **COUNT VIII**

#### **SEXUAL BATTERY OF A MINOR - FLORIDA**

110. The responses in the preceding paragraphs are incorporated by reference.

111. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

112. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

113. The allegations contained in this paragraph including legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore, the allegations are denied. Defendant specifically denies he has caused Plaintiff's extreme

mental, physical, psychological, and emotional trauma. Defendant denies assaulting or restraining Plaintiff.

114. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

115. The allegations contained in this paragraph including legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore, the allegations are denied. Defendant specifically denies he has caused Plaintiff's extreme mental, physical, psychological, and emotional trauma. Defendant denies assaulting Plaintiff.

116. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

117. Denied.

118. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

## **COUNT IX**

### **HUMAN TRAFFICKING - FLORIDA**

119. The responses in the preceding paragraphs are incorporated by reference.

120. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

121. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

122. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

123. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

124. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

125. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

126. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

127. Denied.

128. Denied.

129. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

130. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

#### **COUNT X**

#### **INCEST - FLORIDA**

131. The responses in the preceding paragraphs are incorporated by reference.

132. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

133. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

134. Denied.



135. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

136. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

## **COUNT XI**

### **INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS - FLORIDA**

137. The responses in the preceding paragraphs are incorporated by reference.

138. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

139. The allegations contained in this paragraph including legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore, the allegations are denied. Defendant specifically denies he has caused Plaintiff's extreme mental, physical, psychological, and emotional trauma. Defendant denies assaulting or restraining Plaintiff.

140. The allegations contained in this paragraph including legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore, the allegations are denied. Defendant specifically denies he has caused Plaintiff's extreme mental, physical, psychological, and emotional trauma. Defendant denies assaulting or restraining Plaintiff.

141. Denied.

142. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

143. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

## **COUNT XII**

### **FALSE IMPRISONMENT - FLORIDA**

144. The responses in the preceding paragraphs are incorporated by reference.

145. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

146. Denied.

147. The allegations contained in this paragraph including legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore, the allegations are denied. Defendant specifically denies he has caused Plaintiff's extreme mental, physical, psychological, and emotional trauma. Defendant denies assaulting or restraining Plaintiff.

148. The allegations contained in this paragraph including legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore, the allegations are denied. Defendant specifically denies he has caused Plaintiff's extreme mental, physical, psychological, and emotional trauma. Defendant denies assaulting or restraining Plaintiff.

149. The allegations contained in this paragraph including legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore, the allegations are denied. Defendant specifically denies he has caused Plaintiff's extreme mental, physical, psychological, and emotional trauma. Defendant denies assaulting or restraining Plaintiff.

150. The allegations contained in this paragraph including legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore, the allegations are denied. Defendant specifically denies he has caused Plaintiff's extreme mental, physical, psychological, and emotional trauma. Defendant denies assaulting or restraining Plaintiff.

151. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

152. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

### **COUNT XIII**

#### **CHILD SEXUAL ABUSE—NEW JERSEY**

153. The responses in the preceding paragraphs are incorporated by reference.

154. The allegations contained in this paragraph including legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore, the allegations are denied. Defendant specifically denies he has caused Plaintiff's extreme

mental, physical, psychological, and emotional trauma. Defendant denies assaulting or restraining Plaintiff.

155. The allegations contained in this paragraph including legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore, the allegations are denied. Defendant specifically denies he has caused Plaintiff's extreme mental, physical, psychological, and emotional trauma. Defendant denies assaulting or restraining Plaintiff.

156. The allegations contained in this paragraph including legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore, the allegations are denied. Defendant specifically denies he has caused Plaintiff's extreme mental, physical, psychological, and emotional trauma. Defendant denies assaulting or restraining Plaintiff.

157. The allegations contained in this paragraph including legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore, the allegations are denied. Defendant specifically denies he has caused Plaintiff's extreme mental, physical, psychological, and emotional trauma. Defendant denies assaulting or restraining Plaintiff.

158. The allegations contained in this paragraph including legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore,

the allegations are denied. Defendant specifically denies he has caused Plaintiff's extreme mental, physical, psychological, and emotional trauma. Defendant denies assaulting or restraining Plaintiff.

159. Denied.

160. The allegations contained in this paragraph including legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore, the allegations are denied. Defendant specifically denies he has caused Plaintiff's extreme mental, physical, psychological, and emotional trauma. Defendant denies assaulting or restraining Plaintiff.

#### **COUNT XIV**

##### **HUMAN TRAFFICKING—NEW JERSEY**

161. The responses in the preceding paragraphs are incorporated by reference.

162. The allegations contained in this paragraph including legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore, the allegations are denied. Defendant specifically denies trafficking Plaintiff. Defendant further denies that he is a human trafficker.

163. The allegations contained in this paragraph including legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore, the allegations are denied. Defendant specifically denies he has caused Plaintiff's extreme mental, physical, psychological, and emotional trauma. Defendant denies assaulting, restraining,

holding, recruiting, luring, enticing, harboring, transporting, providing or maintaining Plaintiff or any other person to engage in sexual activity and to provide labor or services.

164. The allegations contained in this paragraph including legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore, the allegations are denied. Defendant specifically denies he has caused Plaintiff's extreme mental, physical, psychological, and emotional trauma. Defendant denies assaulting or restraining Plaintiff, or using physical force, abuse, threats of force and abuse, physical restraint, fraud, deceit or misrepresentation in order to accomplish anything. Defendant specifically denies a trafficking scheme.

165. The allegations contained in this paragraph including legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore, the allegations are denied. Defendant specifically denies he has caused Plaintiff's extreme mental, physical, psychological, and emotional trauma. Defendant denies assaulting or restraining Plaintiff, or using physical force, abuse, threats of force and abuse, physical restraint, fraud, deceit or misrepresentation in order to accomplish anything. Defendant specifically denies a trafficking scheme (as an organizer, supervisor, financier, or manager) including receiving anything of value.

166. The allegations contained in this paragraph including legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore, the allegations are denied. Defendant specifically denies he has caused Plaintiff's extreme

mental, physical, psychological, and emotional trauma. Defendant denies assaulting, restraining, holding, recruiting, luring, enticing, harboring, transporting, providing or maintaining Plaintiff or any other person to engage in sexual activity and to provide labor or services.

167. The allegations contained in this paragraph including legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore, the allegations are denied. Defendant specifically denies he has caused Plaintiff's extreme mental, physical, psychological, and emotional trauma. Defendant denies assaulting, restraining, holding, recruiting, luring, enticing, harboring, transporting, providing or maintaining Plaintiff or any other person to engage in sexual activity and to provide labor or services.

168. The allegations contained in this paragraph including legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore, the allegations are denied. Defendant specifically denies he has caused Plaintiff's extreme mental, physical, psychological, and emotional trauma. Defendant denies assaulting, restraining, holding, recruiting, luring, enticing, harboring, transporting, providing or maintaining Plaintiff or any other person to engage in sexual activity and to provide labor or services.

169. The allegations contained in this paragraph including legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore, the allegations are denied. Defendant specifically denies he has caused Plaintiff's extreme mental, physical, psychological, and emotional trauma. Defendant denies assaulting, restraining, holding, recruiting, luring, enticing, harboring, transporting, providing or maintaining Plaintiff or



any other person to engage in sexual activity and to provide labor or services. Defendant specifically denies any trafficking scheme.

170. The allegations contained in this paragraph including legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore, the allegations are denied. Defendant specifically denies he has caused Plaintiff's extreme mental, physical, psychological, and emotional trauma. Defendant denies assaulting, restraining, holding, recruiting, luring, enticing, harboring, transporting, providing or maintaining Plaintiff or any other person to engage in sexual activity and to provide labor or services.

171. The allegations contained in this paragraph including legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore, the allegations are denied. Defendant specifically denies he has caused Plaintiff's extreme mental, physical, psychological, and emotional trauma. Defendant denies assaulting, restraining, holding, recruiting, luring, enticing, harboring, transporting, providing or maintaining Plaintiff or any other person to engage in sexual activity and to provide labor or services.

172. The allegations contained in this paragraph including legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore, the allegations are denied. Defendant specifically denies he has caused Plaintiff's extreme mental, physical, psychological, and emotional trauma. Defendant denies assaulting, restraining, holding, recruiting, luring, enticing, harboring, transporting, providing or maintaining Plaintiff or any other person to engage in sexual activity and to provide labor or services.



173. The allegations contained in this paragraph including legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore, the allegations are denied. Defendant specifically denies he has caused Plaintiff's extreme mental, physical, psychological, and emotional trauma. Defendant denies assaulting, restraining, holding, recruiting, luring, enticing, harboring, transporting, providing or maintaining Plaintiff or any other person to engage in sexual activity and to provide labor or services.

174. The allegations contained in this paragraph including legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore, the allegations are denied. Defendant specifically denies he has caused Plaintiff's extreme mental, physical, psychological, and emotional trauma. Defendant denies assaulting, restraining, holding, recruiting, luring, enticing, harboring, transporting, providing or maintaining Plaintiff or any other person to engage in sexual activity and to provide labor or services.

#### **FIRST AFFIRMATIVE DEFENSE**

Plaintiff's claims are barred by the doctrine of laches.

#### **SECOND AFFIRMATIVE DEFENSE**

Plaintiff's claims are barred by applicable statute of limitations.

#### **THIRD AFFIRMATIVE DEFENSE**

Plaintiff's claims are barred, in whole or in part, because some or all of Plaintiff's alleged damages are the result of Plaintiff's mental impairment which is the result of independent, preceding or superseding causes.

**FOURTH AFFIRMATIVE DEFENSE**

Plaintiff's claims are barred, in whole or in part, because of Plaintiff's purported emotional and mental anguish were not proximately caused by any act of the Defendant.

**FIFTH AFFIRMATIVE DEFENSE**

The Defendant Ronald A. Cohen respectfully submits and hereby gives notice that Plaintiff's Complaint contains false and frivolous allegations against the Defendant, violates Rule 11 of the Federal Rules of Civil Procedure and demands that the false and frivolous allegations be withdrawn within 21 days of service of this Answer to the First Amended Complaint.

**SIXTH AFFIRMATIVE DEFENSE AND MOTION TO DISMISS**

The Defendant moves to dismiss Claims VIII, IX, X, XI, XII, XIII, XIV in that this Court does not have jurisdiction over claims arising in Florida and New Jersey.

**DEMAND FOR JURY TRIAL**


Defendant hereby demands a jury trial on all issues which can be heard by a jury.

**PRAYER FOR RELIEF**

WHEREFORE, the Defendant prays for judgment as follows:

1. That the Complaint be dismissed with prejudice;
2. That Plaintiff have and recover nothing from Defendant; and
3. That the costs of this action, including a reasonable attorney's fees, be taxed to the Plaintiff;
4. Sanction Plaintiff pursuant to N.C. R. Civ. P. 11; and
5. If the Motion to Dismiss is denied, Defendant requests a jury trial.

This the 20<sup>th</sup> day of March, 2020.

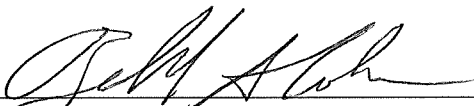
  
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RONALD A. COHEN, *pro se*  
2171 Britton Road  
Apt. 208  
Leland, NC 28451

### CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that the foregoing document was duly served upon all parties to this matter by depositing a copy thereof in the United States mail, first-class postage prepaid, and addressed as follows:

Steven L. Caponi, Esq.  
Matthew B. Goeller, Esq.  
K&L GATES LLP  
600 N. King Street  
Suite 901  
Wilmington, DE 19801

This the 20<sup>th</sup> day of March, 2020.

  
\_\_\_\_\_  
RONALD A. COHEN, *pro se*  
2171 Britton Road  
Apt. 208  
Leland, NC 28451